

### REMARKS

In response to the Office Action dated April 18, 2007, Applicants respectfully request reconsideration based on the above claim amendments and the following remarks. Applicants respectfully submit that the claims as presented are in condition for allowance. Reconsideration of the present application is respectfully requested in view of the following remarks. Prior to entry of this response, Claims 1-18 and 20 were pending in the application, of which Claims 1, 8, and 14 are independent. In the Office Action dated April 18, 2007, Claims 1-18 and 20 were rejected under 35 U.S.C. § 103(a) and under 35 U.S.C. § 112. Following this response, Claims 1-18 and 20 remain in this application. Applicants hereby address the Examiner's rejections in turn.

#### I. Rejection of the Claims Under 35 U.S.C. § 112, Second Paragraph

In the Office Action dated April 18, 2007, the Examiner rejected Claims 1-18 and 20 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicants regard as their invention. Applicants respectfully traverse this rejection with respect to Claims 8-17 because independent Claims 8 and 14 each recite "one or more field names" before reciting "the one or more field names." Accordingly, Applicants respectfully submit that this rejection of Claims 8-17 has been overcome. Independent Claim 1 has been amended to recite "one or more field names." Applicants respectfully submit that the amendment to Claim 1 overcomes this rejection of Claims 1-7 and 20 and adds no new matter.

## II. Rejection of the Claims Under 35 U.S.C. § 103(a)

In the Office Action, the Examiner rejected Claim 1-18 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,999,948 ("*Nelson*") in view of U.S. Patent No. 6,496,843 ("*Getchius*"). Claims 1, 8, and 14 have been amended, and Applicants respectfully submit that the amendments overcome this rejection and add no new matter.

Amended Claim 1 is patentably distinguishable over the cited art for at least the reason that it recites, for example, "creating an executable class file utilizing the field engine table to retrieve one or more field names of the form, a form name corresponding to each of the one or more field names of the form, and a version number corresponding to each of the one or more field names of the form." Amended Claims 8 and 14 each includes a similar recitation. Support for these amendments can be found in the specification at least page 10, lines 4-32.

Consistent with embodiments of the invention, a field engine table 38 may be utilized by a database access class 36 to generate a markup language for displaying a form. (See specification, page 10, lines 4-7.) Database access class 36 may be called from a JSP page 42. (See specification, page 10, line 7.) In particular, field engines table 38 may define field names for each of the fields in a form and a data type for each field. (See specification, page 10, lines 8-9.) To accomplish this, field engine table 38 may contain a form name field 44A, a field name field 44B, a version number field 44C, and a form type field 44N. (See specification, page 10, lines 9-11.)

In contrast, *Nelson* at least does not disclose the aforementioned recitation. As stated by the Examiner, *Nelson* does not disclose utilizing a field engine table to retrieve one or more field names of a form. (See Office Action, page 4, lines 4-5.) Because *Nelson* does not disclose utilizing a field engine table to retrieve one or more field names of a form, Applicants respectfully submit that *Nelson* cannot disclose utilizing the field engine table to also retrieve a form name corresponding to each of the one or more field names of the form and a version number corresponding to each of the one or more field names of the form.

Furthermore, *Getchius* does not overcome *Nelson*'s deficiencies. *Getchius* merely discloses that an external process may copy blob data from multiple tables in which an associated field name differ with each table. (See col. 52, lines 31-33.) The external process uses the data included in a temporary table 1242 to fetch or access the blob data associated with a particular table name and field name to subsequently index into each particular table name using the identifier to extract the actual blob data. (See col. 52, lines 38-42.) Therefore, *Getchius*, fetches blob data associated with a particular table and field name. However, nowhere in *Getchius* does it disclose utilizing a field engine table to retrieve a form name corresponding to a form's field names or a version number corresponding to the form's field names. Rather *Getchius* fetches blob data associated merely with a particular table name and field name, not with a form name or a version number corresponding to each of one or more field names of a form.

Combining *Nelson* with *Getchius* would not have led to the claimed invention because *Nelson* and *Getchius*, either individually or in any reasonable combination, at least do not disclose "creating an executable class file utilizing the field engine table to

retrieve one or more field names of the form, a form name corresponding to each of the one or more field names of the form, and a version number corresponding to each of the one or more field names of the form," as recited by amended Claim 1. Amended Claims 8 and 14 each includes a similar recitation. Accordingly, independent Claims 1, 8, and 14 each patentably distinguishes the present invention over the cited art, and Applicants respectfully request withdrawal of this rejection of Claims 1, 8, and 14.

Dependent Claims 2-7, 9-13, and 15-18 are also allowable at least for the reasons described above regarding independent Claims 1, 8, and 14, and by virtue of their respective dependencies upon independent Claims 1, 8, and 14. Accordingly, Applicants respectfully request withdrawal of this rejection of dependent Claims 2-7, 9-13, and 15-18.

### III. Rejection of the Claims Under 35 U.S.C. § 103(a)

In the Office Action, the Examiner rejected Claim 20 under 35 U.S.C. § 103(a) as being unpatentable over *Nelson* in view of *Getchius* further in view of U.S. Patent No. 6,718,515 ("*Conner*"). Dependent Claim 20 is patentably distinguishable over the cited art for at least for the reason that it includes, due to its dependency on amended independent Claim 1, "creating an executable class file utilizing the field engine table to retrieve one or more field names of the form, a form name corresponding to each of the one or more field names of the form, and a version number corresponding to each of the one or more field names of the form."

As stated above, consistent with embodiments of the invention, a field engine table 38 may be utilized by a database access class 36 to generate a markup language for displaying a form. (See specification, page 10, lines 4-7.) Database access class 36 may be called from a JSP page 42. (See specification, page 10, line 7.) In particular, field engines table 38 may define field names for each of the fields in a form and a data type for each field. (See specification, page 10, lines 8-9.) To accomplish this, field engine table 38 may contain a form name field 44A, a field name field 44B, a version number field 44C, and a form type field 44N. (See specification, page 10, lines 9-11.)

In contrast, and as stated above, *Nelson* at least does not disclose the aforementioned recitation. As stated by the Examiner, *Nelson* does not disclose utilizing a field engine table to retrieve one or more field names of a form. (See Office Action, page 4, lines 4-5.) Because *Nelson* does not disclose utilizing a field engine table to retrieve one or more field names of a form, Applicants respectfully submit that *Nelson* cannot disclose utilizing the field engine table to also retrieve a form name corresponding to each of the one or more field names of the form and a version number corresponding to each of the one or more field names of the form.

Furthermore, *Getchius* does not overcome *Nelson's* deficiencies. As stated above, *Getchius* merely discloses that an external process may copy blob data from multiple tables in which an associated field name differ with each table. (See col. 52, lines 31-33.) The external process uses the data included in a temporary table 1242 to fetch or access the blob data associated with a particular table name and field name to subsequently index into each particular table name using the identifier to extract the

actual blob data. (See col. 52, lines 38-42.) Therefore, *Getchius*, fetches blob data associated with a particular table and field name. However, nowhere in *Getchius* does it disclose utilizing a field engine table to retrieve a form name corresponding to a form's field names or a version number corresponding to the form's field names. Rather *Getchius* fetches blob data associated merely with a particular table name and field name, not with a form name or a version number corresponding to each of one or more field names of a form.

Furthermore, *Conner* does not overcome *Nelson's* and *Getchius's* deficiencies. *Conner* merely discloses a method for creating a table format object and using the object to generate an HTML table as a dynamic page in response to a client browser. (See col. 5, lines 11-14.) The routine begins by creating a table format object called a *tableFormatter*. (See col. 5, lines 14-16.) The object is created during a page authoring process. (See col. 5, lines 16-17.) In response to a client request, the request object and data object are passed, in *Conner*, to the *tableFormatter* that formats the table for use in a page. (See col. 5, lines 38-44.) In other words, in response to a client request, a .jsp servlet creates the HTML table. Then the servlet populates the table according to properties set in the *tableFormatter* that is hard-coded by a page author. *Conner* populates a table according to properties that are hard-coded and not retrieved. Like *Nelson* and *Getchius*, *Conner* at least does not disclose utilizing a field engine table to retrieve a form name corresponding to a form's field names or a version number corresponding to the form's field names.

Combining *Nelson* with *Getchius* and *Conner* would not have led to the claimed invention because *Nelson*, *Getchius*, and *Conner*, either individually or in any reasonable combination, at least does not disclose "creating an executable class file utilizing the field engine table to retrieve one or more field names of the form, a form name corresponding to each of the one or more field names of the form, and a version number corresponding to each of the one or more field names of the form," as included in dependent Claim 20. Accordingly, dependent Claim 20 patentably distinguishes the present invention over the cited art, and Applicants respectfully request withdrawal of this rejection of dependent Claim 20.

#### IV. Conclusion

In view of the foregoing remarks, Applicants respectfully request the reconsideration and reexamination of this application and the timely allowance of the pending claims. The preceding arguments are based only on the arguments in the Office Action, and therefore do not address patentable aspects of the invention that were not addressed by the Examiner in the Office Action. The claims may include other elements that are not shown, taught, or suggested by the cited art. Accordingly, the preceding argument in favor of patentability is advanced without prejudice to other bases of patentability. Furthermore, the Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicant declines to automatically subscribe to any statement or characterization in the Office Action.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 13-2725.

Respectfully submitted,  
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Date: July 13, 2007

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